

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

STATE OF KANSAS, STATE OF SOUTH CAROLINA, STATE OF IOWA, STATE OF ALABAMA, STATE OF ALASKA, STATE OF ARKANSAS, STATE FLORIDA, STATE OF GEORGIA, STATE OF IDAHO, STATE OF INDIANA, COMMONWEALTH OF KENTUCKY, STATE OF MISSOURI, STATE OF MONTANA, STATE OF NEBRASKA, STATE OF OKLAHOMA, STATE OF NORTH DAKOTA, STATE OF SOUTH DAKOTA, STATE OF UTAH, COMMONWEALTH OF VIRGINIA, STATE OF WEST VIRGINIA, LEADINGAGE KANSAS, LEADINGAGE SOUTH CAROLINA, LEADINGAGE IOWA, LEADINGAGE COLORADO, LEADINGAGE MARYLAND, LEADINGAGE MICHIGAN, LEADINGAGE MINNESOTA, LEADINGAGE MISSOURI, LEADINGAGE NEBRASKA, LEADINGAGE NEW JERSEY/DELAWARE, LEADINGAGE OHIO, LEADINGAGE OKLAHOMA, LEADINGAGE PA, SOUTH DAKOTA ASSOCIATION OF HEALTHCARE ORGANIZATIONS, LEADINGAGE SOUTHEAST, LEADINGAGE TENNESSEE, LEADINGAGE VIRGINIA, DOOLEY CENTER, WESLEY TOWERS,

Plaintiffs,

v.

XAVIER BECERRA, in his official capacity as Secretary of the United States Department of Health and Human Services; UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES; CENTERS FOR MEDICARE & MEDICAID SERVICES; and CHIQUITA BROOKS-LASURE, in her official capacity of Administrator of the Centers for Medicare and Medicaid Services,

Defendants.

Civil Action No. 1:24-cv-00110

**PLAINTIFFS' MOTION TO EXCEED
PAGE LIMITS**

PLAINTIFF'S MOTION FOR LEAVE TO EXCEED PAGE LIMITS

This motion is offered by Plaintiffs for leave to exceed the applicable page limit with their brief in support of their October 22, 2024, motion for a preliminary injunction.

Plaintiffs respectfully request leave to file a 37-page brief that will exceed, by 17 additional pages, the 20-page limit that generally applies to briefs pursuant to Local Rule 7(h). Plaintiffs are a coalition of 20 states and 21 private organizations who are injured by and suffering irreparable harm from Defendants' Final Rule. Due to the length and complexity of the challenged rule, as well as the need to adequately and completely describe the harms suffered by 41 Plaintiffs, Plaintiffs have good cause to exceed Rule 7(h)'s page limits in order to address, completely and concisely, their several claims.

Plaintiffs have not conferred with opposing counsel, pursuant to L.R. 7(k), because as of this filing, no opposing counsel has submitted an appearance on behalf of Defendants. Plaintiffs' brief is attached as an exhibit to this motion, and will also be attached to Plaintiffs' October 22, 2024, motion for preliminary injunction.

Respectfully submitted, this 22nd day of October, 2024,

KRIS W. KOBACH
Attorney General of Kansas

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CERTIFICATE OF SERVICE

This is to certify that on this 22nd day of October, 2024, I electronically filed the above and foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Since no counsel of record has made an appearance for Defendants, service will occur pursuant to the Federal Rules of Civil Procedure.

/s/ Abhishek S. Kambli
Abhishek S. Kambli
Counsel for Plaintiff State of Kansas